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**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re: Subpoena to Terry Keebaugh**

**SUSAN E. CONREY**

Plaintiff/Respondent,

v.

**IBM CORPORATION**

Defendant/Movant.

**CIVIL ACTION NO.:** \_\_\_\_\_

**(Case No. 17-CV-00817 pending in the  
United States District Court for the  
District of New Jersey)**

**MOTION TO QUASH SUBPOENA AND FOR A PROTECTIVE ORDER**

**TO THE CLERK OF COURT, ALL INTERESTED PARTIES, AND THEIR  
COUNSEL OF RECORD: PLEASE TAKE NOTICE** that the undersigned counsel for  
Defendant/Movant IBM Corporation (“IBM”) files the within Motion to the United States District  
Court for the Eastern District of Pennsylvania for an Order granting IBM’s Motion to Quash  
Plaintiff/Respondent Susan Conrey’s Third-Party Subpoena and for a Protective Order or, in the  
alternative, for an Order transferring the instant motion to the District of New Jersey.

**PLEASE TAKE FURTHER NOTICE** that the undersigned will rely on the supporting Memorandum of Law and Certification of John M. Nolan with supporting exhibits. A proposed form of Order is also submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that IBM requests oral argument in connection with the within Motion.

Date: September 18, 2019

**RESPECTFULLY SUBMITTED,**



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